

Tiki Brown
Tiki Brown
Clerk of State Court
Clayton County, Georgia
Hannah Lowery

**IN THE STATE COURT OF CLAYTON COUNTY
STATE OF GEORGIA**

RONALD WRIGHT, <p style="text-align: center;">Plaintiff,</p> <p>vs.</p> <p>SANCHEZ ARREDONDO and COBRA CARRIER, LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>CASE ACTION FILE NO.: 2023CV00526</p> <p>JURY TRIAL DEMANDED</p>
--	---

RULE 5.2 CERTIFICATE OF SERVICE OF DISCOVERY MATERIALS

Plaintiff hereby certifies that a true and correct copy of the following was delivered for service with the Summons and Complaint:

1. Plaintiff's First Request for Admissions to Each Defendant;
2. Plaintiff's First Interrogatories to Each Defendant;
3. Plaintiff's First Request for Production of Documents to Each Defendant;

This 3rd day of March, 2023.

Respectfully submitted,

/s/ Edward Hardrick
EDWARD HARDRICK, ESQ.
Georgia Bar No. 606792
Attorney for Plaintiff

Morgan & Morgan, PLLC
178 S Main Street
Unit 300
Alpharetta, Georgia 30009
Main: (770) 576-7634
(Fax): (770) 576-7684
ehardrick@forthepeople.com

2023CV00526

**IN THE STATE COURT OF CLAYTONCOUNTY
STATE OF GEORGIA**

RONALD WRIGHT,

Plaintiff,

vs.

**SANCHEZ ARREDONDO and COBRA
CARRIER, LLC,**

Defendants.

CIVIL ACTION FILE
NO.: _____

**PLAINTIFF'S FIRST REQUEST FOR ADMISSIONS TO
DEFENDANTS**

Plaintiff submits herewith to the above-named Defendant, pursuant to O.C.G.A. § 9-11-36 for response within forty-five (45) days after service hereof, the following request for admissions, for purposes of the pending action only, subject to all objections that may be interposed at the trial of the case:

1.

Please admit that this action brought against the Defendants properly and correctly name the parties to be sued in this case.

2.

Please admit that jurisdiction for the Complaint filed by Plaintiff is properly brought before this Court in Clayton County, Georgia.

3.

Please admit that the service of process against the Defendants was proper.

4.

Please admit that Defendant SANCHEZ ARREDONDO, who operated the tractor-trailer vehicle had permission to operate the tractor trailer from and/or was operating the tractor-trailer on behalf of Defendant Cobra Carrier, LLC at the time of the subject collision.

5.

Please admit that Defendant SANCHEZ ARREDONDO was negligent in the operation of a tractor trailer which resulted in the subject collision with Plaintiff's vehicle.

6.

Admit that Defendant SANCHEZ ARREDONDO pled guilty to, paid the fine for, or knowingly forfeited the bond to charges stemming from a citation in connection with the collision.

7.

Please admit that Plaintiff was injured in the subject collision.

8.

Please admit that the Plaintiff's actions did not cause or contribute to the subject collision.

9.

Please admit that Plaintiff incurred medical expenses for treatment of injuries resulting from the subject collision.

10.

Please admit that Plaintiff's medical expenses were reasonable and necessary for the care and treatment of the injuries sustained in the subject collision.

11.

Please admit that there are no other individuals besides Plaintiff and Defendant SANCHEZ ARREDONDO who caused or contributed to the subject collision.

12.

Please admit that there are no other individuals besides Defendant SANCHEZ ARREDONDO who caused or contributed to the subject collision.

13.

Please admit that you have not seen Plaintiff since the day of the accident.

14.

Please admit that you had not seen Plaintiff at any point in time prior to the day of the accident.

This Request for Admissions is served upon you together with Plaintiff's Complaint.

This 3rd day of March, 2023.

By: /s/ Edward J. Hardrick
EDWARD HARDRICK, ESQ.
Georgia Bar No. 606792
Attorney for Plaintiff

MORGAN & MORGAN, PLLC
178 S Main Street
Unit 300
Alpharetta, Georgia 30009
Main: (770) 576-7634
Fax: (770) 576-7684
Email: ehardrick@forthepeople.com

**IN THE STATE COURT OF CLAYTON COUNTY
STATE OF GEORGIA**

RONALD WRIGHT,

Plaintiff,

vs.

**SANCHEZ ARREDONDO and COBRA
CARRIER, LLC,**

Defendants.

CIVIL ACTION FILE
NO.: _____

**PLAINTIFF'S FIRST INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS**

TO: Defendants by and through their counsel of record.

Plaintiff, pursuant to O.C.G.A. §§ 9-11-33 and 9-11-34, submits herewith to Defendant for response within forty-five (45) days after service hereof, in the form provided by law, the following interrogatories and request for production of documents.

The within interrogatories and request for production of documents are continuing in nature and require supplemental response upon the discovery of other or further information or documents pertinent thereto. In answering the following interrogatories, Defendant is required to give full and complete information based upon the knowledge, information and belief of all agents, employees, investigators, adjusters, and insurers of said Defendant.

1.

State the name and address of any individual or entity with any ownership or lease interest in the tractor or trailer (including any container or chassis if applicable) driven by Defendant Sanchez Arredondo on the date of the incident referred to in the Complaint and describe the nature of the interest.

2.

Identify all vehicle leases, subleases, trip leases, or other leasing or sharing arrangements involving the tractor or trailer (including any container or chassis, if applicable) by Defendant Sanchez Arredondo from 30-days prior to the subject collision to thirty days subsequent to the collision.

3.

Forty-Five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan Atlanta, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, copies of any lease, contract, or other agreement regarding the tractor or trailer (including any container or chassis, if applicable) driven by Defendant Sanchez Arredondo on the day of the incident referred to in the complaint. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

4.

Forty -Five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices of MORGAN & MORGAN, PLLC, 178 SOUTH MAIN STREET, SUITE 300, ALPHARETTA, GEORGIA 30009, copies of the bill of sale, title, and/or any other documents relating to the ownership of the tractor and trailer driven (including container or chassis, if applicable) by Defendant Sanchez Arredondo on the date of the incident referred to in the complaint. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

5.

Forty -Five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices of MORGAN & MORGAN, PLLC, 178 SOUTH MAIN STREET, SUITE 300, ALPHARETTA, GEORGIA 30009, copies any lease, employment contract, or any other

documents regarding the employment status of Defendant Sanchez Arredondo. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

6.

State the point of origin, destination and reason for the trip being made by the Defendant at the time of the incident referred to in the Complaint.

7.

Forty-Five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices of MORGAN & MORGAN, PLLC, 178 SOUTH MAIN STREET, SUITE 300, ALPHARETTA, GEORGIA 30009, a copy of the bill of lading for any loads carried by Defendant Sanchez Arredondo for the 8-day period preceding the incident referred to in the Complaint. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

8.

In regard to the load being transported by Defendant Sanchez Arredondo at the time of the subject-collision, identify:

- (a) Where the load originated;
- (b) The contents thereof;
- (c) The weight of said load;
- (d) The final destination of the load; and
- (e) Any contracts, bills of lading, shipment documents, consignment forms, fax, correspondence, or other writings pertaining to transportation of said load.

9.

Was the Defendant's vehicle covered by liability insurance? If so, please state the names of all insurers providing liability insurance on said vehicle and give the limits of coverage of each such policy.

10.

Has any insurer referred to above denied coverage or reserved its right to later deny coverage under any such policy of liability insurance? If so, please explain.

11.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, a copy of any policy of insurance identified in response to Interrogatory #9 above. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

12.

Do you contend that Plaintiff caused or contributed to the collision in question? If so, state with particularity each and every contention made in this regard.

13.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, any trip reports or dispatch records in regard to Defendant Sanchez Arredondo for the 2-week period preceding the incident referred to in the Complaint. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

14.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, a copy of all driver's logs or timecards for Defendant Sanchez Arredondo for the 6-month period preceding the incident referred to in the Complaint. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

15.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, copies of all weight tickets, check stubs, fuel receipts, invoices, hotel bills and other records for any expenses incurred by Defendant Sanchez Arredondo for the 6-month period preceding the incident referred to in the Complaint. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

16.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, copies of all daily, monthly, and annual inspection reports, and any other inspection reports concerning the tractor and trailer (or container or chassis, if applicable) driven by Defendant Sanchez Arredondo on the day of the incident referred to in the Complaint for the 1-year period preceding this incident and the 6-month period following this incident. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

17.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, copies of all maintenance records, repair invoices and work orders concerning the tractor and trailer (or container or chassis, if applicable) driven by Defendant Sanchez Arredondo on the day of the incident referred to in the Complaint for the 1-year period preceding this incident and the 6-month period following this incident. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

18.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, a copy of Defendant Sanchez Arredondo's driver qualification file, including but not limited to:

- (a) Application for employment;
- (b) Copy of his CDL license;
- (c) Driver's certification of prior motor vehicle accidents;
- (d) Driver's certification of prior violations of motor vehicle laws;
- (e) Driver's prior employment history;
- (f) Carrier's inquiry into his driving record;
- (g) Carrier's inquiry into his employment record;
- (h) Documents regarding carrier's annual review of his driving record;
- (i) Response of each state agency to carrier's annual inquiry concerning his driving record;
- (j) Certification of driver's road test;
- (k) Medical examiners certificate;
- (l) Statement setting forth in detail any denial, revocation, or suspension of any license, permit or privilege to operate a motor vehicle;
- (m) Training certificates and training documents;
- (n) Drug testing records; and
- (o) Any other documents.

In lieu of this, you may attach copies thereof to your answers to these interrogatories.

19.

Did you conduct a post-accident alcohol and controlled substance test on Defendant Sanchez Arredondo? If so, please state:

- (a) The date of testing;
- (b) Who performed the test;
- (c) Where the test was performed; and
- (d) The results of the test.

20.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, copies of any printouts, records, correspondence, memoranda, or other documents concerning post-accident alcohol and controlled substance testing of Defendant Sanchez Arredondo. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

21.

If post-accident testing was not performed on Defendant Sanchez Arredondo, please state the reasons such testing did not occur.

22.

Was a post-accident report completed and forwarded to the Federal Highway Administration? If not, please state the reasons it was not completed.

23.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300,

Alpharetta, Georgia 30009, a copy of any post-accident report. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

24.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, the accident register for Defendant for the 1-year period preceding the subject-accident. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

25.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, copies of any driver manuals, guidelines, rules or regulations issued to drivers by Defendant or kept by Defendant. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

26.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, copies of any reports, memoranda, notes, logs or other documents evidencing any complaints about Defendant Sanchez Arredondo. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

27.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan Atlanta, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, copies of all safety manuals, brochures, handouts, literature,

and/or other written documents pertaining to safety provided to drivers by Defendant or kept by Defendant (including any provided to Defendant Sanchez Arredondo). In lieu of this, you may attach copies thereof to your answers to these interrogatories.

28.

Please state in detail the factual basis for each defense you have raised in your Answer and/or response to the Complaint in the above-styled action.

29.

State the name, address, and telephone number for the President, Safety Director, Federal Safety Regulation Compliance Officer, and the Dispatcher for the trip which ultimately resulted in the collision, and all persons who interviewed and were involved with the hiring or associating of Defendant Sanchez Arredondo.

30.

State whether the tractor involved in the collision contained or utilized an on-board recording device, an on-board computer, tachograph, trip monitor, trip recorder, trip master, Qualcomm, Vorad, ECM or device known by any other name which records information concerning the operation of the tractor.

31.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, copies of any printouts, records or documents produced by any device identified in response to the preceding interrogatory for the 6-month period prior to the incident referred to in the complaint. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

32.

Describe the tractor operated by Defendant Sanchez Arredondo at the time of the collision, including but not limited to the year, make, and model, mileage, maintenance history, all features, specifications, special equipment, governors, on-board recording devices, radar detectors, CB radios, or other descriptive information regarding the tractor and trailer unit.

33.

Has Defendant ever been cited by the Department of Transportation, Public Service Commission, or Federal Highway Administration for violation of the Federal Motor Carrier Safety Regulations? If so, please state for each instance:

- (a) The date of the violation;
- (b) A description of the violation;
- (c) The location where the violation occurred;
- (d) The agency issuing the citation; and
- (e) The ultimate disposition of the charges.

34.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, any document concerning any violation identified in response to the preceding interrogatory. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

35.

Has Defendant ever been disqualified or placed out-of-service? If so, please state for each instance.

- 1.The dates of disqualification; and
- 2.The reason for the disqualification.

36.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, any document concerning any disqualification or out-of-service order identified in response to the preceding interrogatory. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

37.

Identify the name and address of any repair facility which performed repairs or maintenance on the tractor and trailer (including any container or chassis, if applicable) driven by Defendant Sanchez Arredondo on the date of the incident referred to in the complaint for the 1-year period preceding the incident and 6-month period after the incident.

38.

State the extent of any training provided to Defendant Sanchez Arredondo by this Defendant or any outside agency since the date of Defendant Sanchez Arredondo's application for employment or the date he began driving for this Defendant, whichever came first.

39.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, copies of any documents regarding any training received by Defendant Sanchez Arredondo. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

40.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, any permits or licenses regarding the tractor and trailer driven by Defendant Sanchez Arredondo and the load transported by Defendant Sanchez Arredondo at the time of the incident referred to in the Complaint. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

41.

Please explain the nature of the employment relationship between this Defendant and Defendant Sanchez Arredondo (*i.e.*, lease operator, company driver, temporary driver, etc.), including, but not limited to: the date the employment relationship began and – if the employment relationship has been terminated – the date of such termination along with the identity of the person who terminated such driver.

42.

With respect to Defendant Sanchez Arredondo, please state the driver's mode of compensation.

43.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, the payroll information concerning said driver for the 6-months prior to and the 2-months subsequent to said collision and his pay check for the time period covering the date of the collision. (Note: *Plaintiff's counsel is not requesting copies of pay checks unless otherwise specified but requests the individualized payroll record ledger sheet indicating the*

amount of pay, miles driven for the time periods specified, etc.). In lieu of this, you may attach copies thereof to your answers to these interrogatories.

44.

Does this Defendant, on its own or through its insurer, or through any other person or business, obtain information from any private source or governmental agency concerning the driving history, driving infractions, and motor vehicle records of drivers it employs? If so, please state the name and business of each entity through which such information was requested or obtained concerning the driver involved in the subject collision, and the dates upon which such information was obtained concerning the driver operating the commercial truck involved in the subject-collision.

45.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, all motor vehicle records or reports of any kind received from any private corporation or service, or any governmental entity relative to the driving history, driving record, and driving infractions of Defendant Sanchez Arredondo since the commencement of said driver's employment with this Defendant up and through the date of trial. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

46.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, all documents and materials sent to or received from the Director of Regional Motor Carrier Safety of the Office of the Federal Highway Administration, the Georgia Regulatory Authority, or any other governmental agency relative to the subject collision which is

made the basis of this lawsuit. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

47.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, all certificates of authority, filings, registrations, license, permits, or other related documents issued by or sent to any governmental entity in regard to this Defendant or this Defendant's operations. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

48.

Please identify all automobile accidents and/or moving violations for Defendant Sanchez Arredondo prior to and subsequent to the incident referred to in the Complaint, including the date of the event, the location, the jurisdiction and a description of the event.

49.

Please state Defendant Sanchez Arredondo's date of birth, social security number, and driver's license number.

50.

Please identify the cell phone number and service provider for all cell phones owned, used or operated by Defendant Sanchez Arredondo on the date of the incident.

51.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, copies of cellphone records showing incoming and outgoing calls,

texts and messages for the date of the incident. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

52.

State the name and address of any person, including any party, who, to your knowledge, information or belief:

- (a) Was an eyewitness to the incident complained of in this action;
- (b) Has some knowledge of any fact or circumstance upon which your defense is based;
- (c) Has conducted any investigation relating to the incident complained of or the background, employment, medical history or activities of Plaintiff.

53.

To your knowledge, information or belief, has any person identified in answering the preceding interrogatory given any statement or report in connection with this action and/or the incident complained of in this action? If so, describe such statement or report and give the name and address of the person having custody and control thereof.

54.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, all such statements or reports. In lieu thereof, you may attach copies to your answers to these interrogatories.

55.

To your knowledge, information or belief are there any videotapes, photographs, plats or drawings of the scene of the incident referred to in the Complaint, the vehicles or Plaintiff? If so, please describe such videotapes, photographs, plats or drawings and give the name and address of

the person having custody and control thereof.

56.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, any videotapes, photographs, plats or drawings. In lieu thereof, you may attach copies to your answers to these interrogatories.

57.

If you intend to call any expert or technician as a witness at the trial of this action, state the subject matter on which he is expected to testify and state in detail the opinions held by each such expert or technician and give a complete summary of the grounds for each opinion held.

58.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, any and all videotapes, photographs, reports, data, memoranda, handwritten notes, or other document reviewed by and/or generated by an individual identified in response to the preceding interrogatory. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

59.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, any documents obtained through a request for production of documents or subpoena. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

60.

In regard to any document which has not been produced on grounds of privilege, please state the following:

- (a) The date each document was generated;
- (b) The person generating each document;
- (c) The present custodian of each document; and
- (d) A description of each document.

61.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, any medical records, videotapes, photographs, or other evidence concerning, referencing, or depicting plaintiff. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

62.

Forty-five (45) days after service hereof, you are requested to produce for inspection and copying by Plaintiff at the offices Morgan & Morgan, PLLC, 178 South Main Street, Suite 300, Alpharetta, Georgia 30009, any PSP report or similar report from the FMCSA on the defendant driver showing his prior accidents and inspection history. In lieu of this, you may attach copies thereof to your answers to these interrogatories.

SERVED WITH COMPLAINT.

(Signature is on the next page.)

This 3rd day of March, 2023.

By: /s/ Edward J. Hardrick
EDWARD HARDRICK, ESQ.
Georgia Bar No. 606792
Attorney for Plaintiff

MORGAN & MORGAN, PLLC
178 S Main Street
Unit 300
Alpharetta, Georgia 30009
Main: (770) 576-7634
Fax: (770) 576-7684
Email: ehardrick@forthepeople.com